

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

PETER PEDERSEN)	
<i>Plaintiff,</i>)	Civil Action No.
v.)	1:23-cv-00071-ADA-DTG
ZOHO CORPORATION)	
<i>Defendant</i>)	

MOTION FOR THE WITHDRAW OF PLAINTIFF'S ATTORNEY

Plaintiff's counsel Joseph J Zito hereby moves the Court for an Order to Withdraw as counsel for Plaintiff, Peter Pedersen.

Plaintiff Pedersen and undersigned counsel have reached an impasse in proceeding in this matter. This matter is currently stayed and should remain stayed for a period of time sufficient for Plaintiff Pedersen to find substitute counsel. Plaintiff Pedersen is financed by AiPi, Inc., who has stated that it has resources to obtain substitute counsel for Plaintiff and is currently seeking to engage substitute counsel.

Mr. Pedersen was informed that he can appeal the Decision of the PTAB in the IPR and the District Court cases will remain stayed, or he can withdraw assertion of the claims found invalid by the PTAB and proceed forward with the District Court cases on the claims which have not been found invalid. Mr. Pedersen was informed of the following deadlines: The Final Written Decision issued by the PTAB in the IPR is dated MAY 10, 2024. The date to seek reconsideration (37 C.F.R. § 42.71(d)(2)) was June 10, 2024. The date to appeal the PTAB decision in the IPR by filing a Notice of Appeal is July 12, 2024.

Mr. Pedersen was also informed that undersigned counsel is not filing any appeal of the

IPR decision. Mr. Pedersen will seek new counsel through AiPi.

No prejudice will come to Plaintiff by undersigned counsel's withdrawal at this time and during the stay of the proceedings. If the stay of this matter is lifted, Mr. Pedersen should be afforded sufficient time to obtain substitute counsel.

A proposed Order for the relief sought is attached hereto.

CERTIFICATE OF CONFERENCE

Pursuant to Local Rules, undersigned counsel conferred with counsel for Defendant. Counsel for Defendant has stated that they are not opposed.

Plaintiff Pederson has been notified of this motion, received a copy and has indicated that he is not opposed to counsel's withdrawal.

Respectfully Submitted

/s/ Joseph J Zito
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on June 25, 2024, the foregoing Motion to Withdraw was filed with the Court's CM/ECF system and that all counsel of record have been served thereby. I further certify that Plaintiff, Mr. Peter Pedersen has been served with a copy of this Motion via email: pp@cocopelli.com and via DHL to: Peter Pedersen, Gammel Hareskovvej 285, 3500 Værløse, Denmark

/s/ Joseph J. Zito
Joseph J. Zito